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Attorney for Plaintiffs
Rebekah Charleston; Angela Delgado-Williams;
and Leah Albright-Byrd

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

REBEKAH CHARLESTON; ANGELA
DELGADO-WILLIAMS; and LEAH
ALBRIGHT-BYRD;

Plaintiff,

vs.

STATE OF NEVADA; STEVE SISOLAK,
in his capacity as Governor of the State of
Nevada, and the
LEGISLATURE OF THE STATE OF
NEVADA;

Defendants.

Case No.: 3:19-cv-00107-MMD-WGC

**APPENDIX TO PLAINTIFFS’
OPPOSITION TO CASH
PROCESSING SERVICES, INC. AND
LANCE GILMAN’S MOTION TO
INTERVENE AS DEFENDANTS**

Plaintiffs Rebekah Charleston, Angela Delgado-Williams, and Leah Albright-Byrd,
by and through their undersigned counsel of record, files this Appendix of Exhibits to their
Opposition to Cash Processing Services, Inc. and Lance Gilman’s Motion to Intervene as
Defendants.

DATED this 28th day of March, 2019.

HUTCHISON & STEFFEN, PLLC

By: /s/ Jason D. Guinasso, Esq.

JASON D. GUINASSO, ESQ. (SBN# 8478)
Attorney for Plaintiffs Rebekah Charleston; Angela
Delgado-Williams and Leah Albright-Byrd

List of Exhibits

Description	Volume Number	Bates Range
Exhibit 1-Examples of Advertising and Marketing at Mr. Gilman's brothel	I	PLTFS0001-PLTFS0017
Exhibit 2-Seo-Young Cho, Axel Dreher, & Eric Neumeyer, Does Legalized Prostitution Increase Human Trafficking?, WORLD DEVELOPMENT, at pg. 41, 67-82 (2012), https://eprints.lse.ac.uk/45198/1/Neumayer_Legalized_Prostitution_Increase_2012.pdf	I	PLTFS0018-PLTFS0066
Exhibit 3- Crysta N. Price, Terry D. Clark, & Julie Faller, Nevada's Online Commercial Sex Market, HUMAN TRAFFICKING INITIATIVE, CREIGHTON UNIVERSITY (2017), https://awakenreno.org/wp-content/uploads/2018/05/FINAL_Nevada_March2018.pdf	I	PLTFS0067-PLTFS0089
Exhibit 4-Melissa Farley, Trafficking for Prostitution: Making the Connections, AMERICAN PSYCHOLOGICAL ASSOCIATION (2007)	I	PLTFS0090-PLTFS0097
Exhibit 5-Shapiro & Hughes, Decriminalized Prostitution: Impunity for Violence and Exploitation, UNIVERSITY OF RHODE ISLAND (2017)	I	PLTFS0098-PLTFS0127
Exhibit 6-Research Report, Who Buys Sex? Understanding and Disrupting Illicit Market Demand, Demand Abolition (Nov., 2018)	I	PLTFS0128-PLTFS0180
Exhibit 7-U.S. DEPARTMENT OF STATE, TRAFFICKING IN PERSONS REPORT at pg. 27 (2007)	I	PLTFS0181-PLTFS0182
EXHIBIT 8-RONALD B. FLOWERS, PROSTITUTION IN THE DIGITAL AGE: SELLING SEX FROM THE SUITE TO THE STREET? at pg. 42-46 (Praeger 2011)	I	PLTFS0183-PLTFS0188
Exhibit 9-Ray Hager, <i>Tahoe-Reno Industrial Center's Gilman has threatened Laxalt, used extortion-like tactics against him, Laxalt consultant says</i> , NEVADA NEWSMAKERS (SEPT. 18, 2018)	I	PLTFS0189-PLTFS0190
Exhibit 10-Press Release, Mustang Ranch statement regarding fed. anti-brothel lawsuit (Feb. 25, 2019)	I	PLTFS0191-PLTFS0192
Exhibit 11-Daniel Rothberg, <i>In the county that claims Mark Twain, an irrelevant online publisher faces off with a powerful developer who is a journalist</i> , THE NEVADA INDEPENDENT (MAR. 17, 2019, 2:10A.M.)	I	PLTFS0193-PLTFS0213

1	Exhibit 12-Dennis Myers, <i>Shield?</i> , RENO NEWS & REVIEW (MAR. 14, 2019)	I	PLTFS0214- PLTFS0217
2	Exhibit 13-Marcella Corona, <i>Nevada judge rules online</i>	I	PLTFS0218-
3	<i>journalist must reveal sources, not protected by media shield</i> , RENO GAZETTE JOURNAL (MAR. 7, 2019, 5:49P.M.)		PLTFS0223

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Hutchison & Steffen, PLLC, over the age of 21 years, and not a party to nor interested in the within action. I certify that on this date, the foregoing was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Gus W Flangas gwf@fdlawlv.com, cjm@fdlawlv.com, lmr@fdlawlv.com

Pursuant to FRCP 5(b), I certify that I am an employee of Hutchison & Steffen, PLLC, over the age of 21 years, and not a party to nor interested in the within action. I certify that on this date, I caused the foregoing to be served by U.S. Mail on all parties in said action by placing a true and correct copy thereof enclosed in a sealed envelope designated for outgoing mail, addressed as set forth below:

Steve Sisolak Governor of the State of Nevada	State of Nevada
c/o State Capitol Building	Steve Sisolak, Governor of State of Nevada
101 N. Carson St.	Legislature of the State of Nevada
Carson City, NV 89701	c/o Nevada Attorney General
	100 N. Carson St.
	Carson City, NV 89701
Legislature of the State of Nevada	Proposed Defendant-Intervenors Cash
c/o Brenda J. Erdoes, Legislative Counsel	Processing Services, Inc. and Lance Gilman
Bureau- Legal Division	Gus Flangas, Esq.
Legislative Building	Jessica K. Peterson, Esq.
401 S. Carson St.	Flangas Dalacas Law Group
Carson City, NV 89701	3275 South Jones Blvd., Suite 105
	Las Vegas, NV 89146

Dated this March 28, 2019.

/s/ A. Otutaha
Employee of Hutchison & Steffen,
PLLC

EXHIBIT 1

(Examples of Advertising and Marketing at Mr. Gilman's brothel)

EXHIBIT 1



Olivia Lush @ Mustang 3/25-4/4

@TheOliviaLush

Follow



“Come with me, where dreams are born and time is never wasted!”

Returning to @TheMustangRanch March 25th to April 4th #Ask4Olivia
#YourBrazilianBeauty #Reno #Sparks



9:23 AM - 17 Mar 2019

7 Retweets 30 Likes



2

7

30


Mustang Ranch Resort Retweeted



Olivia Lush @ Mustang 3/25-4/4 @TheOliviaLush · Mar 6


Let's make memories @TheMustangRanch from March 25th to April 4th

 for appointments 775-343-1224

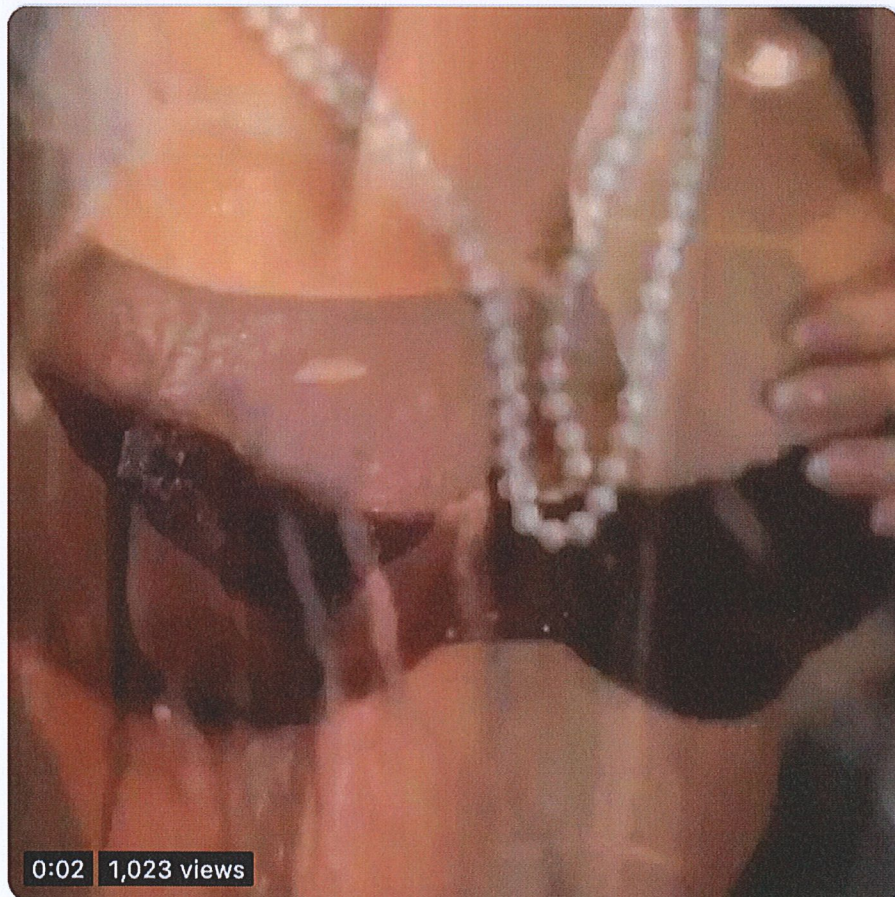
 TheOliviaLush@gmail.com

 OliviaLush.com #photos #videos #Blog #calendar #wishlist

#Ask4Olivia #YourBrazilianBeauty

Please #RT 

 **Mustang Ranch Resort**



 1

 6

 10



Kitti Minx @Kitti_Minx · Jan 14

Come see this [#booty](#) at [@TheMustangRanch](#) in less than 2 months! Book your [#appointment](#) now! 🤔💋❤️ [#model](#)



3 2 23



Skyler Maves [#IStandWithVic](#)

@MavesSkyler

Follow

Replying to [@Kitti_Minx](#) [@TheMustangRanch](#)

Wow, god I need to visit Vegas.

9:41 PM - 14 Jan 2019

1



Kitti Minx @Kitti_Minx · Jan 14

Replying to [@MavesSkyler](#) [@TheMustangRanch](#)

*Reno :)

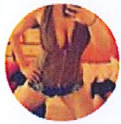
1



Skyler Maves [#IStandWithVic](#) @MavesSkyler · Jan 14

Doesn't matter, I need to visit. You're too tempting to ignore^^

2

**Tori Mustang**

@MustangTori

Follow



Come visit me at [#mustangranch](#) [#exit28](#) [#reno](#) [#naturalboobs](#) [#brunette](#). Keep me company, whether it's for a half hour, or even all night. Let's discuss your fantasies and try to make them happen. Call 775 343 1224 for appointments.

[instagram.com/p/BkRoBcmnAF93](https://www.instagram.com/p/BkRoBcmnAF93) ...

10:43 PM - 20 Jun 2018

1 Like



1

**Krickett Wilde**

@WildeKrickett

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Packing to fly West for a couple of weeks.
See you [@TheMustangRanch](#)

7:03 PM - 8 Feb 2016

2 Likes



2



Mustang Ranch Resort

@TheMustangRanch

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Repost - Next [@TheMustangRanch](#)
availability August 14th to 27th. Pre-book
now!

For appointments  1-800-727-8638

Website [OliviaLush.com](#) [#photos](#) [#video](#)
[#blog](#)

Instagram [theolivialush](#)

This media may contain sensitive material. [Learn more](#)

View

8:41 PM - 10 Aug 2018

2 Retweets 14 Likes



 2

 14

Pleasure Menu - MustangRanchBrothel.com

 mustangranchbrothel.com/pleasure-menu-2.html

Welcome to the World Famous Mustang Ranch Resort & Spa, a part of Nevada's rich and colorful history since 1971. Our beautiful and elegant ladies pride themselves on making you feel as comfortable and welcome as possible. Please feel free to browse through the many pleasurable fantasies that await you knowing that fulfilling your desires is our ultimate goal.

Before your erotic journey begins, relax and enjoy yourself in our beautifully appointed lounge and parlor areas perhaps with an exquisite meal from our award-winning chef, a glass of premium wine, a fine cigar, or a cold beverage from our fully stocked bar.

You are never rushed, and you are never pressured. Once you pass through our doors, we simply want you to view this as your island oasis away from the stresses and problems of everyday life.

Once you have chosen a lady (or two, or whatever your desire), you can share your fantasies with them and discuss your specialized visit created solely for you. Then stay as long as you wish, perhaps even for the night in one of our private bungalows.

The World Famous Mustang Ranch prides itself on operating well above the standards and guidelines as governed by state and local authorities to ensure that your experience is a safe, fun, and memorable one.

Pleasure Menu

Special Shows

Lingerie Show ~ For your eyes only, a private parade of nightgowns, garters, panties, teddies, and more.

Vibrator Show ~ Watch her titillate herself, or you take your turn doing it for her.

Shower Show, ~ Good clean fun as our ladies, lather themselves up for a wet and wild experience.

Two (or more) Girl Show ~ Sit back and watch your ladies frolic, play, and pleasure one another right before your very eyes.

Drag Party ~ With your ladies' wardrobe available at your disposal, this time it's you who gets to put on the show.

Sexy Cinema ~ Sit with a lady (or two) of your choice and enjoy the best in adult pornographic features or short films.

Foreplay

Nude Massage ~ No need for clothing for either of you. Relieve the day's tensions with a soothing and relaxing full body massage from a gorgeous lady of your choice all the way to your ultimate climax and release. Need four hands all over your body? Enjoy twice the pleasure with two ladies.

Breast Massage ~ It's not what you think. Imagine the feel of two soft, supple breasts gliding their way across your body in sensual motion. It's unlike anything you can imagine.

French Tease ~ Imagine a gorgeous lady gently and sensually kissing, nibbling, and licking all over your neck, ears, shoulders, nipples, and torso.

Fire & Ice ~ Experience the soothing warmth or the exhilarating chill of a woman's mouth as she teases you with different temperature liquids in an oral sex experience you won't soon forget.

Wild Horse Chair Party ~ Bet you can't sit still. Pull up a chair and watch your lady go down on you and then reverse the roles as you pleasure her.

Berries & Cream ~ Feast on ripe, fresh berries and sweet whipped cream right off the soft nude body of one of our beautiful ladies.

Shower Party ~ Shower with your lady...which you can enjoy before or after your sexual journey. Warning. The water is warm, and the suds are oh so slippery. (wink)

Cuddly Softness ~ Need just to feel pampered and adored? Sometimes you're just not in the mood for a full-blown sexual encounter, but you still want to feel the nurturing closeness of that special someone. Lie down in sheer bliss as your lady lays next to you with a soothing touch and the warm softness of her skin next to yours.

Bubble Bath ~ If you're feeling a little "dirty," you can always indulge yourself in an aroma-filled bubble bath with a lady (or two) of your choice. Complete with champagne.

Full Pleasure

Straight Lay ~ Conventional Missionary style sex...when keeping it simple is still the best.

Wild Horse Round-Up ~ To hell with "conventional". Mix it up in whatever position you wish. Try our sex swing or any one of our carefully selected and specifically "engineered" sex furnishings.

Half & Half ~ How you start and how you finish is up to you. Oral and straight sex.

Ménage à Trois ~ (house recommendation) The classic two on one sexual encounter that's sure to please "everyone". Bondage & Domination ~ Take charge of your sweet lady or let her dominate you into submission. Furry handcuffs, light bondage restraints, and

other pleasure implements are available to please even the most discriminate B&D palate.

Specialties

Bungalow Party ~ Choose from a wide variety of themed suites to party in, The Italian Suite, Asian Suite, Hawaiian Suite, Safari Suite, just to name a few. See and "experience" the world's largest bed, sleeps twelve for an incredible party.

In Ranch and Off Ranch Dates ~ You can book a lady (or ladies) for as long as you like on or off the ranch property. Overnight stays with your lady in her private room are always welcome.

Jacuzzi Parties ~ Indoor or outdoor group events for wet and wild erotic fun.

Bachelor Parties ~ Catering to the groom to be and all his merry men.

VIP Party Room ~ Create your themed party in our private VIP Room, complete with mirrors, stage, music, movies, lavish furnishings and more.

Remember, everything is negotiable. We will do our best to make you more than satisfied.

Mustang Ranch Resort & Spa

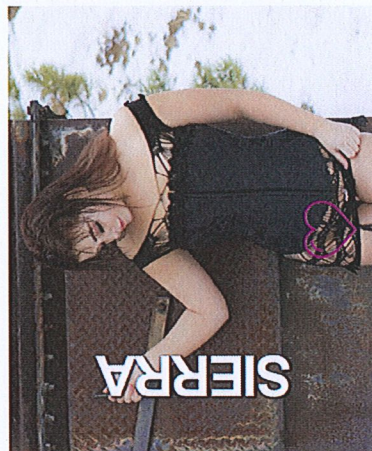
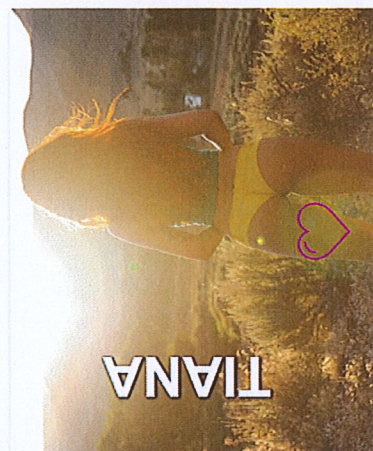
1011 Wild Horse Canyon Dr. McCarran, NV

(775) 343-1224

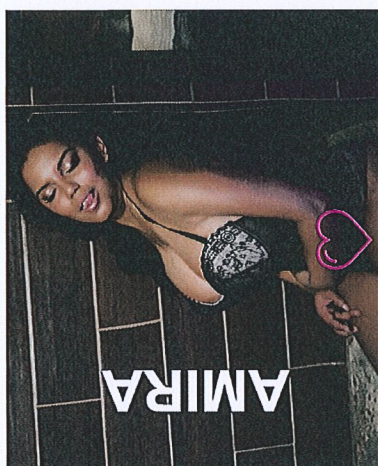
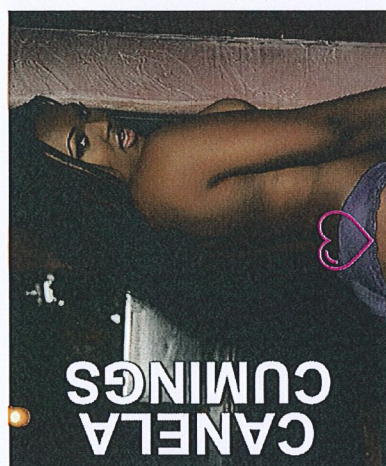
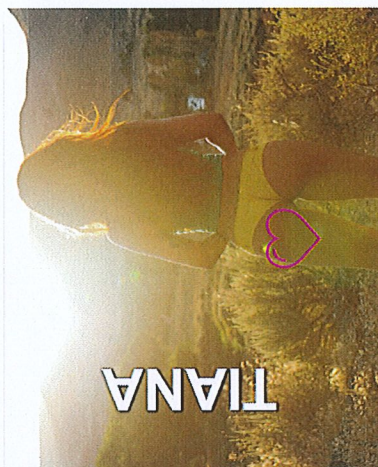
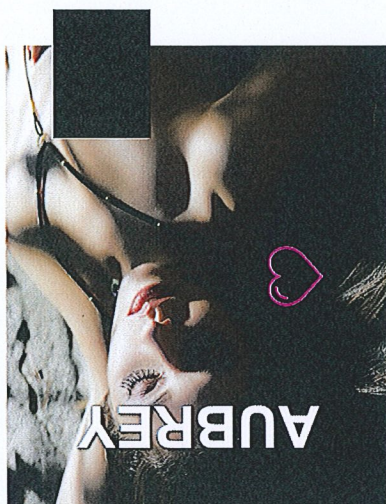
www.mustangranchbrothel.com

Just 10 minutes from Reno, at Exit 28 off Interstate 80

WORLD-CLASS
MUSTANG RANCH LADIES



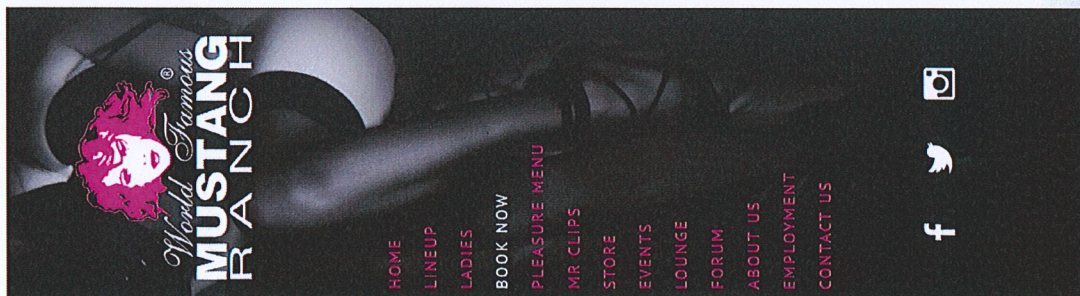
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LINEUP



World Famous
MUSTANG
RANCH

HOME
LINEUP
LIVES
BOOK NOW
FEATURE MENU
PER CLIPS
STORE
EVENTS
DUNGE
DRUM
ABOUT US
EMPLOYMENT
CONTACT US

f t i



BOOK NOW

Book Now

Name

Email *

Lady you wish to book

Date/Time/Info

Submit